

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

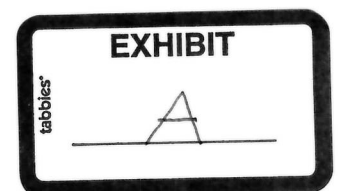
WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16-cv-563

DEFENDANTS' RULE 26(a)(1)(A) INITIAL DISCLOSURE

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel, hereby make the following initial disclosure. Defendants make this disclosure based on information currently available and expressly reserve their right to supplement, delete, or modify it as additional information is discovered or as new information becomes available. This disclosure is made without waiving Defendants' rights to object on evidentiary grounds such as competency, privilege, relevance, materiality, hearsay, or other established grounds to the use of such information or documents.



1. Persons with knowledge – Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), Defendants list the following persons who likely have discoverable information that Defendants may use to support their defenses.¹

- a. Albert J. Dwoskin. Likely has general knowledge of criminal background check and credit check policy and general knowledge of the lease application and renewal policies for Waples Mill Home Park (the “Park”).
- b. Michael Dean. Likely has knowledge regarding the criminal background check and credit check policy in general, including the arrangement with Yardi.
- c. Josephine Giambanco. Likely has knowledge regarding the criminal background check and credit check policy in general. Likely has knowledge regarding lease application and renewal processes and policies for the Park, including the renewal applications for the Plaintiffs. Likely has general information regarding the administration and management of the Park.
- d. Mayra Lopez. Likely has knowledge regarding the criminal background check and credit check policy in general. Likely has knowledge regarding lease application and renewal processes for the Park, including the renewal applications for the Plaintiffs.
- e. Valerie Dixon. Likely has knowledge regarding lease application and renewal policies for the Park.

¹ The individuals listed in categories a – k can be contacted through undersigned counsel.

- f. Jessica Armstead. Likely has knowledge regarding criminal background checks and credit check policy.
- g. Carolina Easton. Likely has general knowledge regarding criminal background checks and credit check policy. Likely has knowledge regarding conversations with some tenants regarding lease renewal and the presentment of lease documents including identification documents by tenants. Likely has knowledge regarding lease application and renewal policies for the Park.
- h. Peter Williams. Likely has general knowledge regarding criminal background checks and credit check policy. Likely has knowledge regarding lease application and renewal policies for the Park.
- i. Mark Jones. Likely has knowledge regarding criminal background checks and credit check policy. Likely has knowledge regarding lease application and renewal policies for the Park.
- j. Brady Bustany. Likely has knowledge regarding the criminal background check and credit check policy in general, including the arrangement with Yardi.
- k. Patrick Hennessey. Likely has knowledge regarding the criminal background check and credit check policy in general, including the arrangement with Yardi.
- l. Sindy Obando. 13002 Salford Terrace Upper Marlboro, MD 20772. (h)301-952-0990; (c)301-335-0307. Likely has knowledge regarding the criminal background check and credit check policy in general and lease application and renewal policies for the Park.

- m. Vanessa Jorquera. 6013 Dinwiddie Street Springfield, VA 22150. 703-732-1254. Likely has knowledge regarding the criminal background check and credit check policy in general and lease application and renewal policies for the Park.
- n. Yvette Jimenez. 2631 S. 27th Street Arlington, VA 22206. 703-946-6939. Likely has knowledge regarding the criminal background check and credit check policy in general. Likely has knowledge regarding lease application and renewal processes for the Park.
- o. Sabiha Noorzai. 45822 Shumard Oak Lane Sterling, VA 20164. (h)517-926-9120, (c)703-919-1461. Likely has knowledge regarding the criminal background check and credit check policy in general. Likely has knowledge regarding lease application and renewal processes for the Park.
- p. Teresa Osborn. 10903 Beach Mill Road Great Fall, VA 22066. 703-307-2253. Likely has knowledge regarding the criminal background check and credit check policy in general. Likely has knowledge regarding lease application and renewal processes for the Park.

Defendants reserve the right to rely upon the testimony of any witnesses listed by Plaintiffs in their Rule 26(a)(1) disclosures.

2. Documents - Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), Defendants list the following categories of documents or categories of documents that it may use in support of their defenses.

- a. Application Policy/Procedures and forms for the Park, including future resident information guide and qualifying criteria.
- b. Lease forms for the Park.
- c. Criminal background/credit check policy, including Yardi's screening resident criteria.
- d. Agreements with Yardi and CoreLogic who performed background searches during the last five years
- e. Plaintiffs' Lease Files, which include written communications with Plaintiffs.
- f. Any documents provided to staff discussing Fair Housing, including certifications of completion of Fair Housing webinars.

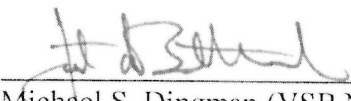
Defendants reserve the right to introduce documents listed by Plaintiffs in their Rule 26(a)(1) disclosure to support their defenses.

3. Computation of Damages – Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii), Defendants state that they do not currently seek damages and that, therefore, this disclosure is inapplicable.

4. Insurance Agreements – Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv), Defendants state that there are no insurance policies that would satisfy any possible judgment in this action or indemnify or reimburse for any payments made to satisfy such a judgment.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT
LIMITED PARTNERSHIP AND
A.J. DWOSKIN & ASSOCIATES, INC.




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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2016, I caused the foregoing to be sent to the following via email and U.S. mail, postage, prepaid:

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